

County of Santa Clara

Social Services Agency

333 West Julian Street
San Jose, California 95110-2335



February 12, 2010

FEB 16 2010

Ramon S. Lopez, Chief
Civil Rights Bureau
Human Rights and Community Services Division
744 P Street
Sacramento, CA 95815

Subject: Civil Rights Compliance Review – Corrective Action Plan

Dear Mr. Lopez:

In response to the Civil Rights Compliance Review Report dated November 12, 2009, attached is our Corrective Action Plan addressing some compliance issues (deficiencies) identified in the report. In responding, we used your report format by adding one additional column for our response. As noted in our response, some items were addressed during or immediately after the on-site review in April 2009.

Thank you and your staff for the cooperation and assistance provided during the Civil Rights Compliance Review. On a special note, I would like to express our appreciation to Jim Tashima and Elsa Garcia, Civil Rights Program Consultants, for their valued assistance and guidance to our new Civil Rights Coordinator, Lisa Holmes.

If there are any questions regarding our Corrective Action Plan, please contact Lisa Holmes at (408) 491-6391; Lisa.Holmes@ssa.sccgov.org.

Sincerely,

WILL LIGHTBOURNE
Agency Director

c: Nancy Goodban, Deputy Director of Administration – Social Services Agency
Gina Sessions, Deputy Director of Operations
Lisa Holmes, Civil Rights Coordinator – Social Services Agency
Elsa Garcia, Civil Rights Program Consultant - Human Rights and Community Services Division

SANTA CLARA COUNTY



SOCIAL SERVICES AGENCY

**CALIFORNIA HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
HUMAN RIGHTS AND COMMUNITY SERVICES DIVISION**

CIVIL RIGHTS COMPLIANCE REVIEW REPORT

CORRECTIVE ACTION PLAN

FOR

**SOCIAL SERVICES AGENCY
COUNTY OF SANTA CLARA**

February 12, 2010

**Will Lightbourne, Agency Director
Nancy Goodban, Deputy Director of Administration
Gina Sessions, Deputy Director of Operations
333 West Julian Street
San Jose, CA 95110**

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CIVIL RIGHTS COMPLIANCE - CORRECTIVE ACTION PLAN

INTRODUCTION

The California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff assessed Santa Clara County Social Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on April 20 through April 24, 2009 with an introductory meeting held with Karmen Dorsett, Civil Rights Coordinator. An exit interview was held with Santa Clara Managers April 24, 2009 to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Santa Clara Social Services Agency	333 W. Julian , San Jose, CA	IHSS, APS	Spanish
Santa Clara Social Services Agency	100 N. Moffett, Mountain View, CA	CALWORKS, FOOD STAMPS	Spanish
Santa Clara Social Services Agency	1919 Senter Rd, San Jose, CA	FOOD STAMPS, ELIGIBILITY	Spanish
Santa Clara Social Services Agency	373 W. Julian , San Jose, CA	CHILD WELFARE SERVICES	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2008 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers

- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Below is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	5	4
Children Social Workers	12	10
Adult Program Workers	3	3
Receptionist/Screeners	5	4
Total	25	21

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	18
Non-English or limited-English speakers' case files reviewed	62
Languages of clients' cases	English, Spanish, Farsi , Vietnamese, Russian, Chinese

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings/Responses

CDSS Findings					SSA Response
Access to Services, Information and Outreach	Yes	No	Some-times	Comments	Completion Date/Expected Completion Date Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X				In compliance.
Does the county have extended hours to accommodate clients?	X				In compliance.
Can applicants access services when they cannot go to the office?	X				In compliance.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Santa Clara County Social Services Agency ensures awareness of services through the usage of satellite offices throughout the county.	In compliance.

CDSS Findings					SSA Response
Signage, posters, pamphlets	Yes	No	Sometimes	Comments	Completion Date or Expected Completion Date / Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	X X				In compliance.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X				In compliance.
Was the Pub 13 available in large print, audiocassette and Braille?		X		Audiocassette Pub 13 was not available at numerous sites visited.	Though some sites do have Pub 13 in large print, Braille and audio, SSA will ensure that Pub 13 is available in large print, Braille and audio, at the reception areas of client lobbies, by March 15, 2010.
Were the current versions of the required posters present in the lobbies?	X				In compliance.

CDSS Findings					SSA Response
<i>Signage, posters, pamphlets</i>	<i>Yes</i>	<i>No</i>	<i>Sometimes</i>	<i>Comments</i>	<i>Completion Date or Expected Completion Date / Comments</i>
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?		X		<p>Client instructional and directional signage in threshold language was not present in numerous offices.</p> <p><u>333 Julian Street:</u></p> <ul style="list-style-type: none"> • Office Hours • Visitor Entrance sign • Lobby signs <p><u>100 N. Moffett Blvd:</u></p> <ul style="list-style-type: none"> • Parking Directional sign unavailable <p>• Signs not in threshold language:</p> <ol style="list-style-type: none"> 1. SSA mail box 2. Hours 3. CalWORKS Orientation here 4. No Smoking <p>• No Directional sign to main entrance</p> <p>• Lobby signs not in threshold:</p> <ol style="list-style-type: none"> 1. "Please take a number" 2. "Information Center" 	<p>March 15, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.</p> <p>July 30, 2009 In compliance, directional sign installed.</p> <p>February 28, 2010 Client instructional and directional signage will be installed/posted in threshold languages.</p> <p>July 30, 2009 In compliance, directional sign to main entrance installed.</p> <p>February 28, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.</p>

CDSS Findings					SSA Response
<i>Signage, posters, pamphlets</i>	<i>Yes</i>	<i>No</i>	<i>Sometimes</i>	<i>Comments</i>	<i>Completion Date or Expected Completion Date / Comments</i>
				<p><u>1919 Senter Road:</u></p> <ul style="list-style-type: none"> • "Office Hours" sign is not in Threshold Languages. • "Ring Door Bell For Assistance" sign is not in Threshold Language • Numerous signs in lobby are not in Threshold Language: <p>"Medical Center Window"</p> <p>"Health Care Options Referral Here!"</p> <p>"Health Care Options 1-800-430-4263"</p> <p>"Health Care Options"</p> <p>"Welcome Start Here"</p> <p>Digital "ticker tape" board not in Threshold Language</p> <p>"Interpreters Spanish"</p> <p>"Orientation in Session Do Not Interrupt"</p> <p>"Attention, Due to Federal Privacy Laws....."</p> <p>"Not a Waiting Area. Please have a Seat"</p>	<p>February 28, 2010</p> <p>Completion of Client instructional and directional signage will be installed/posted in threshold languages.</p>

CDSS Findings					SSA Response
<i>Signage, posters, pamphlets</i>	<i>Yes</i>	<i>No</i>	<i>Sometimes</i>	<i>Comments</i>	<i>Completion Date or Expected Completion Date / Comments</i>
				<p>....."</p> <p>"Please remain seated in the lobby area"</p> <p>"Please have a seat (2)"</p> <p>"Return Completed Application here (2)"</p> <p><u>373 West Julian:</u></p> <ul style="list-style-type: none"> • <i>Parking: There is no directional signage leading clients to accessible main entrance.</i> • <i>Main Entrance Signs not in threshold language:</i> <p>"Office Hours"</p> <p>"Exit Main Entrance"</p> <p>"Visitors Entrance"</p>	<p>March 15, 2010</p> <p>Completion of Client instructional and directional signage will be installed/posted in threshold languages.</p>

B. Corrective Actions

CDSS Findings		SSA Response
<i>Informational Element</i>	<i>Corrective Action Required</i>	<i>Completion Date or Expected Completion Date / Comments</i>
Auxiliary aids	Santa Clara County shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4	Though some sites do have Pub 13 in large print, Braille and audio, SSA will ensure that Pub 13 is available in all client lobbies at the reception

CDSS Findings		SSA Response
Informational Element	Corrective Action Required	Completion Date or Expected Completion Date / Comments
		areas, in large print, Braille and audio by March 15, 2010.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

1. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 333 Julian Street, San Jose

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
Parking	Four freestanding signs were too short at: 71.5" high, 69.5" high, 70.0" high and 70.5" high. Parking spots located in front of the building.	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133	March 31, 2010. Currently pending sign shop quote and installation.
Parking	Four disabled spots were short at 16' in length. Parking spots located in front of the building.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p. 135	Completed one (1) week after the on-site review in April 2009.
Main Entrance	Office hour's sign is not in threshold language at the front entrance.	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div 21.107-212)	March 15, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.
Main Entrance	Visitors entrance sign not in threshold language in the front entrance.	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary	March 15, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
		language. (Div 21.107-212)	
Client Lobby	"Everyone is Different, but Equal under the Law" Poster is missing.	Posters on nondiscrimination provided by CDSS shall be prominently displayed in all waiting rooms and reception areas. The county welfare department shall place on the posters the name, office telephone number, and office address of the person(s) in the CWD who is responsible for processing discrimination complaints. Posters dealing specifically with nondiscrimination in the Food Stamp Program shall be prominently posted in all certification and issuance offices (Div 21-107.211)	May 1, 2009 The poster on "Everyone is Different, but Equal under the Law" is posted. In compliance.
Client Lobby	Pub 13 in audio and large print was not available.	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). (Div 21-107.221)	On the same day of the inspection Pub 13 in large print and Audio CDs provided and available at reception area.
Men's Restroom	Men's restroom entrance signs are too high. The door sign is 56 ¾" high and the wall sign is 55" high.	Door sign and wall sign shall be 60" above the floor. For permanent identification, the sign shall be installed on the wall adjacent to latch outside of	March 31, 2010 Placement and height of signs will be adjusted.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
		door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263 Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263	
Women's Restroom	Women's restroom entrance signs are too high. The door sign is 55" high and the wall sign is 54" high.	Door sign and wall sign shall be 60" above the floor. For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263 Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263	March 31, 2010 Placement and height of signs will be adjusted.

A2. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 100 N. Moffett Blvd, Mountain View

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
Parking	Three "unauthorized parking" signs at entrance to off-street accessible parking contain incorrect wording.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133	February 28, 2010 The "unauthorized parking" signs to be corrected to contain the correct wording.
Parking	One freestanding sign was 78' high.	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133	February 28, 2010 Sign height to be corrected.
Parking	Directional signage is not available, in the parking lot, to indicate accessible route to the main entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353	July 30, 2009 Directional signage in place.
Main Entrance	These signs were not in threshold language:	Directional and Informational Signage	February 28, 2010 Completion of Client

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
	1. SSA mail box 2. Hours 3. CalWORKS Orientation here 4. No Smoking	should be available in threshold languages. Div 21.107-212	instructional and directional signage will be installed/posted in threshold languages.
Main Entrance	There is no directional signage to the accessible feature at main entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp 183, 353	February 28, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.
Main Entrance	There are no ISA signs on the front entrance to the building.	Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p 355	February 28, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.
Client Lobby	These signs were not in threshold language: 1. "Please take a number" 2. "Information Center"	Directional and Informational Signage should be available in threshold languages. Div 21.107-212	February 28, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
Client Lobby	Pub 13 not available in Braille, or audio at client counter.	Posters (Pub 13) on nondiscrimination provided by CDSS shall be prominently displayed in all waiting rooms and reception areas. The county welfare department shall place on the posters the name, office telephone number, and office address of the person(s) in the CWD who is responsible for processing discrimination complaints. Posters dealing specifically with nondiscrimination in the Food Stamp Program shall be prominently posted in all certification and issuance offices. (Div 21-107.221)	Pub 13 is posted in client lobbies. Also, some sites do have Pub 13 in large print, Braille and on audio, and SSA will ensure that Pub 13 is available in large print, Braille and on audio, at the reception areas of client lobbies, by March 15, 2010.
Client Interview Rooms	Numerous client rooms have desks that are shorter than the 27" minimum height required for knee spaces: Client rooms: <ul style="list-style-type: none"> • 13 – 26" • 26 – 26" • 10 – 26" • 7 – 25" • 9 – 27" • 25 – 25" • 4 – 25.5" • 3 – 26" • 5 – 26" • 27 – not accessible • 21 – not accessible • 2 – 26" • 12 – 26" • 14 – 26" • 15 – 26" 	Minimum seating knee space is 27" high, 30" wide and 19" deep. (CA T24 1122B.3, ADA 4.32.3) p 349	January 15, 2009 Desks replaced to be in compliance.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
Telephones	<p>Operable parts to numerous phones are not in the required height:</p> <ul style="list-style-type: none"> • One EBT Phone is too high at 53" height. . • One Medical Phone is too high at 53" high. • Two Lobby Phones are too high – right phone at 54" high and left phone at 53" high. 	<p>Forward Reach Telephone: highest operable part maximum 48" above the floor. (CA T24 1118B.5, ADA 4.31.3 and 4.2.5) p 351 Side Reach Telephone: the highest operable part shall be 54" maximum above the floor (CA T24 1117B.2.6 & 1118B.6, ADA 4.31.3 & 4.2.6) p 251</p>	<p>February 28, 2010 Adjustment to the height placement of phones to be completed.</p>

A3. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

CONTINUE TO NEXT PAGE

Facility Location: 1919 Senter Road, San Jose

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
Parking	<p>"Unauthorized parking" signs are not located at parking entrance. One is posted in front of a parking spot.</p> <p>(Even though "unauthorized parking" signage is not located at each parking lot entrance, one is visible in front of a disabled space.)</p>	<p>Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133</p>	<p>February 28, 2010 Installation of appropriate parking signage will be completed.</p>
Parking	<p>Six out of eight freestanding signs are not at the appropriate height.</p> <p>From right to left: 79" high, 75" high, 78" high, 76" high, 76.5" high, and 70" high.</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133. Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.5) p 133</p>	<p>February 28, 2010 Freestanding signs will be adjusted or replaced to appropriated required height.</p>
Parking	<p>Seven disabled spots are too narrow at 16' long.</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p 135</p>	<p>July 30, 2009 Disabled parking spots adjusted to appropriate width and length. In compliance.</p>
Parking	<p>One van disabled spot is too short at 16' long.</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135</p>	<p>July 30, 2009 Disabled van parking spot adjusted to</p>

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
		Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p 135	appropriate width and length.
Parking	Signage on pavement clearly depicting a wheelchair w/occupant needs repainting.	Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.5.1 & 2) p 133	July 30, 2009 Repainting of pavement signage completed.
Parking	"No Parking" painted on pavement in access aisles needs repainting.	The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p 135	July 30, 2009 Repainting of pavement signage completed.
Main Entrance	"Office Hours" sign is not in threshold language.	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/ recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants /recipients may request aid or services in their primary language. (Div 21.107-212)	February 28, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
Main Entrance	"Ring Door Bell For Assistance" sign is not in threshold language.	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/ recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants /recipients may request aid or services in their primary language. (Div 21.107-212)	February 28, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.
Client Lobby	<p>Numerous signs in lobby are not in threshold language:</p> <ul style="list-style-type: none"> • "Medical Center Window" • "Health Care Options Referral Here!" • "Health Care Options 1-800-430-4263" • "Health Care Options" • "Welcome Start Here" • Digital "ticker tape" board not in Threshold Language • "Interpreters Spanish" • "Orientation in Session Do Not Interrupt" • "Attention, Due to Federal Privacy Laws....." 	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/ recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants /recipients may request aid or services in their primary language. (Div 21.107-212)	February 28, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action Required	Completion Date or Expected Completion Date / Comments
	<ul style="list-style-type: none"> • "Not a Waiting Area. Please have a Seat" • "Please remain seated in the lobby area" • "Please have a seat (2)" • "Return Completed Application here (2)" 		
Client Lobby	Pub 13 in large print, Braille and audio is not available.	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). (Div 21-107.221)	Though some sites do have Pub 13 in large print, Braille and audio, SSA will ensure that Pub 13 is available in large print, Braille and audio, at the reception areas of client lobbies, by March 15, 2010.

A4. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 373 West Julian, San Jose

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion Date or Expected Completion Date /Comments
Parking	Seven accessible disabled spots are 16' long.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p 135	May 1, 2009 Disabled parking spots adjusted to appropriate width and length.
Parking	Seven accessible disabled spots are 8"9' wide.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p 135	May 1, 2009 Disable parking spots adjusted to appropriate width and length.
Parking	One Van-Accessible space, access aisle, is 8.9' wide and 17' long.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p 135	May 1, 2009 Van Accessible parking space adjusted to appropriate width and length.
Parking	Accessible parking is not located as close as possible to entrance.	Located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1)) p 131	May 1, 2009 Parking spaces re-located to shortest accessible route.
Parking	There is no directional signage leading clients to accessible feature at main entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp 183, 353	March 31, 2010 Directional signage leading clients to accessible feature at main entrance to be installed.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion Date or Expected Completion Date /Comments
Parking	Ramp has a slope of 12.1% (on the side of the building).	Slope of curb ramp does not exceed 1:12 (8.3% slope) (CA T24 1127B.5.3, ADA 4.8.2)	May 1, 2009 Disabled parking spaces moved away from ramp to accessible parking area.
Parking	One access aisle on passenger side of van space has a ramp extending into parking space with a length of 6'2" and width of 4'.	Walks and sidewalks subject to these regulations shall have a continuous surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch and shall be a minimum of 48" in width. Surfaces shall be slip resistant. (CA T24 1133B.7.1) p 160	May 1, 2009 Re-striped walk path.
Main Entrance	Signs not in threshold language: <ul style="list-style-type: none"> • "Office Hours" • "Exit Main Entrance" • "Visitors Entrance" 	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants /recipients may request aid or services in their primary language. (Div 21.107-212)	March 15, 2010 Completion of Client instructional and directional signage will be installed/posted in threshold languages.
Men's Restroom	Force to open door, excessive at 11 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195	May 1, 2009 Force to open door adjusted.
Women's Restroom	Force to open door, excessive at 12 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 195	May 1, 2009 Force to open door adjusted.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

CDSS Findings					SSA Response
Question	Yes	No	Some-times	Comments	Completion Date or Expected Completion Date / Comments
Does the county identify a client's language need upon first contact? How?	X			The County uses a general Language Survey form.	In compliance.
Does the county use a primary language form?	X				In compliance.

CDSS Findings					SSA Response
Question	Yes	No	Some-times	Comments	Completion Date or Expected Completion Date / Comments
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Yes, from review of numerous cases, there is clear evidence that the client is being asked for his/her language preference. The county also makes efforts to match up a client to a same language worker.	In compliance.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			The County utilizes a Language Survey – Interpreter/Translation Request sheet to assess the clients language needs, then if required will utilize in-house certified translators. If required county workers can access an extensive interpreters list for numerous other languages.	In compliance.
Is there a delay in providing services?		X			In compliance.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			The County utilized Language Line and has a very extensive interpreters list for numerous other languages.	In compliance.
Are county interpreters determined to be	X			County interpreters are certified in the	In compliance.

CDSS Findings					SSA Response
Question	Yes	No	Some-times	Comments	Completion Date or Expected Completion Date / Comments
competent?				language they speak and write.	
Does the county have adequate interpreter services?	X			Based on the audit interview process, it was assessed that workers have professional and reliable interpretative services. During the facility audit a list of acceptable interpretative services was provide also.	In compliance.
Does the county allow minors to be interpreters? If so, under what circumstances?	X			The County does allow the usage of a minor (under the age of 18 years) to temporarily act as an interpreter under extenuating circumstances.	In compliance.
Does the county allow the client to provide his or her own interpreter?	X				In compliance.
Does the county use the CDSS-translated forms in the clients' primary languages?	X				In compliance
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials		X		Overall the County does provide auxiliary aids, but in a couple of offices visited the audio tape of the Pub 13 was not available.	Though some sites do have Pub 13 in large print, Braille and audio, SSA will ensure that Pub 13 is available in large print, Braille and audio, at the reception areas of client lobbies, by March 15, 2010.

CDSS Findings					SSA Response
Question	Yes	No	Some-times	Comments	Completion Date or Expected Completion Date / Comments
(besides the Pub 13)?					
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X				In compliance.
Does the county offer screening for learning disabilities?	X			Screening is offered at in-take.	In compliance.
Is there an established process for offering screening?	X			Yes. At intake the client is screened for any learning disabilities.	In compliance.
Is the client identified as having a learning disability referred for evaluation?	X				In compliance.

B. Corrective Actions

Area of Findings	Corrective Actions Required	SSA Response
Auxiliary Aids	Santa Clara County shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services. Div 21-115.41	Please refer to the specific items identified above to be corrected. A corrective action date or a date when corrective action will be completed has been provided.

IX. CONCLUSION

CDSS conducted an on-site compliance review April 20 through April 24, 2009, consisting of an introductory meeting; on-site Program assessments of In-Home Support Services, Adult Protective Services, CalWORKS - Food Stamps, Food Stamps - Eligibility, and Child Welfare Services at four (4) facilities (including parking lots); telephone surveys; and exit meeting. CDSS Reviewers assessed for dissemination of

information; facility accessibility for individuals with disabilities; services to applicants/recipients who are non-English speaking or who have disabilities; review of applicant/recipient case records; staff training records, and the discrimination complaint procedures.

CDSS stated they found satisfactory compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. CDSS commented that there was exceptional cooperation and coordination of the onsite review. CDSS stated the civil rights program was visible in the main reception areas with an overall "climate" of participant service and that County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance. Although the facilities and offices visited in SSA are providing appropriate client support, there are isolated deficiencies that have been corrected and/or a corrective action date has been implemented as identified above in this "Corrective Action Plan".